EAT HAPPY GROUP

Policy Statement of the EAT HAPPY GROUP

on respect for human rights

The group:

The EAT HAPPY GROUP unites various companies with different food concepts under the umbrella of FCF Holding GmbH, headquartered in Koln. As subsidiaries of FCF Holding GmbH, the EAT HAPPY GROUP includes EatHappy ToGo GmbH, EH CandyCuisine GmbH, as well as FCF Holding GmbH's international subsidiaries. The EAT HAPPY GROUP's international subsidiaries today include EatHappy ToGo Luxembourg S.A.R.L, EatHappy ToGo S.R.L, Wakame Italia, and EatHappy ToGo Österreich GmbH.

Our commitment to respect human rights

The EAT HAPPY GROUP is an internationally active business and as such takes its ecological and social responsibilities seriously, both regarding the manufacture of its products as well as the working conditions and the welfare of all its employees. Our duty of care does not end with us but extends along the supply chain to the origin of our goods.

The EAT HAPPY GROUP together with all its employees at every level and in every area of business, and its external partners and suppliers, are committed to respecting and upholding human rights. We recognise the applicable national law, but in all cases also ensure compliance with minimum human rights standards.

Scope:

This policy statement covers companies based in Germany, their entire supply chain and their stakeholders. We understand stakeholders to be all affected parties. We consider the standards set to be binding for the entire EAT HAPPY GROUP and all subsidiaries. We also require our suppliers to respect human rights and to ensure that their own business partners do the same.

Recognition of advanced standards / Our principles

- United Nations Universal Declaration of Human Rights
- The Guidelines on Children's Rights and Business Principles
- the United Nations Guiding Principles on Business and Human Rights
- International Labour Standards of the International Labour Organization

We have set ourselves the goal of mapping our often complex supply chain as fully as possible, and in doing so we rely on a transparent and constructive dialogue with our suppliers. In our dealings with our suppliers, we rely on cooperation in a spirit of partnership, but we also emphasise the responsibility of each actor within the supply chain. Accordingly,

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we have also contractually committed our suppliers to a code of conduct. The code of conduct is reviewed at least once a year and revised if necessary. Violations and non-compliance will lead to appropriate penalties being imposed. As part of the measures, we focus on supplier development, direct exchange and on-site inspections.

We have set up a reporting centre for all stakeholders along the supply chain so that they can make <u>complaints</u> in the event of violations.

We recognise our responsibility in particular in the following areas and have also included these as fields of action in our <u>sustainability strategy</u>:

Social responsibility:

- Exclusion of forced labour
- Prohibition of child labour
- Fair working hours and fair pay
- Safeguarding freedom of association
- Prohibition of discrimination
- Ensuring health and safety at the workplace
- Introduction / guarantee of grievance mechanisms

Ecological responsibility:

- Careful and lawful treatment and discharge of industrial wastewater
- Careful and lawful handling of air emissions
- Careful and lawful handling of waste and hazardous substances
- Reduction of the consumption of raw materials and natural resources
- Careful use of energy consumption / energy efficiency
- Conscientious, careful handling of animal welfare and agriculture

Ethical business conduct:

- Fair competition
- Confidentiality / data protection
- Respect for intellectual property
- Integrity / Combating corruption and bribery

Our methods

The EAT HAPPY GROUP is investing in the digitalisation of risk analysis in order to be able to identify and avoid risks more quickly and precisely. We assess the risk per country using indicators and relevant tools to identify focus areas with higher risk. These are regularly

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reviewed to make sure they remain up to date. These risks are regularly assessed and prioritised according to their severity, probability of occurrence and possible courses of action. In particular, the responsible employees in purchasing are regularly trained to be able to carry out the assessment professionally.

Focus areas

Based on our current products, we have prioritised raw materials, especially fish and rice, as our main areas of action. We see the main risks of these raw materials in the environmental impact of cultivation and working conditions.

In the salmon sector, we focus on ensuring high labour and environmental standards by sourcing raw materials from Norway and processing within the EU. Norway is known for high legal environmental protection standards, especially in fishing, as well as good labour conditions. In addition, we hold discussions with existing suppliers to develop individual strategies for reducing environmental impacts. When procuring tuna, we only purchase products from healthy, non-overfished fishing grounds.

When selecting our rice, we focus on high, consistent quality and are in the process of analysing our suppliers in the areas of human rights, labour standards and water consumption, as well as environmental impact. These risk areas are also taken into account when selecting new suppliers.

Energy & Climate

For the first time, the EAT HAPPY GROUP has carried out an energy audit with an external partner for the financial year 2021, as well as an externally validated CO2 balance. From these results, we have defined focus areas and initial measures to reduce the negative impact of our business on the environment. However, we also see the need to create a solid data basis to be able to define and measure ambitious goals and to check whether they have been achieved. For this reason, we are always seeking dialogue with suppliers, but also with external experts, to collect and evaluate appropriate data.

Outlook

Our documentation and reporting is carried out in accordance with the regulatory requirements.

Jan Fischer

CFO Eat Happy Group / Direktor für Finanzen und Recht

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